

November 26, 2018

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: Docket No. 00-257: Notification of Acquisition of Customers**

Dear Ms. Dortch:

Service Electric Cable T.V., Inc. ("SECTV") hereby notifies the Federal Communications Commission ("Commission") of its intent to acquire all of the customer base of Service Electric Telephone Company, LLC ("SET"), as described more fully below. SECTV does not believe that Section 64.1120(e) of the Commission's Rules, 47 CFR § 64.1120(e), applies to the acquisition because SET provides interconnected Voice over Internet Protocol ("VoIP") service to the customers being acquired by SECTV. In addition, following the transaction, SECTV will provide interconnected VoIP service to the customers. The Commission has not determined whether interconnected VoIP services are telecommunications services and has not yet ruled that the Commission's carrier change rules apply to interconnected VoIP services.<sup>1</sup> Nonetheless, SECTV has complied with the customer notification requirements of Section 64.1120(e) out of an abundance of caution.

**Names of the Parties to the Transaction:** The parties to the transaction include SET, the transferor, and SECTV, the transferee.

**Types of Telecommunications Services Provided to Affected Customers:** SET provides interconnected VoIP services to customers in New Jersey and Pennsylvania. SET will transfer all of its customer base located in New Jersey and Pennsylvania to SECTV.

**Date of Transfer:** The parties have requested approval from the New Jersey Board of Public Utilities and the Pennsylvania Public Utilities Commission for the redemption of SECTV's ownership interest in SET. The parties anticipate that the affected customers will be transferred to SECTV within 10 days following receipt of approval of these applications. Each customer will be informed of their actual transfer date.

**Certification of Compliance:** SECTV certifies that it has complied with the Commission's requirement to provide advance customer notice in accordance with Section 64.1120(e)(3) and with the obligations specified in that notice.

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<sup>1</sup> See *In the Matter of Protecting Consumers from Unauthorized Carrier Changes and Related Unauthorized Charges*, Report and Order, Docket No. CG 17-169, FCC 18-78, at para. 3, fn. 2 ("VoIP providers and Commercial Mobile Radio Service providers are not subject to the slamming verification rules.") (2018)

**Copy of Notice Sent to Affected Subscribers:** Filed herewith is a sample of the customer notification letter that will be mailed at least 30 days prior to the anticipated transfer date.

Please direct any questions regarding this matter to the undersigned at (703) 714-1319 or via email at [mpd@commlawgroup.com](mailto:mpd@commlawgroup.com).

Respectfully submitted,

/s/

Michael P. Donahue

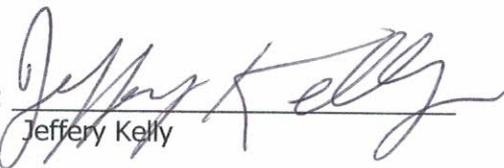
*Counsel for Service Electric Cable T.V., Inc.*

Enclosures

cc: Jeffery Kelly  
James J. Holzinger

**EXHIBIT A**  
**CERTIFICATION**

On behalf of Service Electric Cable T.V., Inc. ("SECTV"), and in accordance with Section 64.1120(e) of the Commission's Rules, 47 C.F.R. § 64.1120(e), I hereby certify under penalty of perjury that I have read the foregoing notification and that the statements contained therein are true, complete and correct to the best of my knowledge, information and belief. I further certify that, with respect to the transfer to SECTV, of the affected customers of Service Electric Telephone Company, LLC, SECTV has complied with the Commission's requirements to provide advance customer notice in accordance with Section 64.1120(e)(3) and with the obligations specified in that notice.

By:   
Jeffery Kelly

Title: Director of Engineering

Date: Nov 21-2018

**EXHIBIT B**

**Customer Notification**

Date October 1, 2018

Dear SERVICE ELECTRIC TELEPHONE Customer:

This letter is to inform you that Service Electric Cable T.V., Inc. (SECTV) has agreed to acquire assets from Service Electric Telephone, LLC (SET), formerly run in partnership with Ironton Telephone Company, LLC ("ITC"), including SET's Voice over Internet Protocol (VoIP) customers. Therefore, pending finalization of the transaction, SECTV will become your new Telephone provider.

Subject to obtaining required state and federal regulatory approvals, **we anticipate that the transition to SECTV will occur on or about November 1, 2018.** Unless you have begun using a service provider other than SET prior to this date, your service will be transferred to SECTV.

The rates, terms, and conditions for the service(s) to which you subscribe at the time of the transition will remain the same. Notice of any future changes in rates, terms, and conditions of SECTV's service will be provided to you as required by law.

The rates, terms, and conditions for the SECTV business service to which your current SET business service will be transitioned will remain the same at the time of the transition. If you receive service under a contract with SET, this letter also notifies you that the contract will be assigned to SECTV upon completion of the transaction and that the rates, terms, and conditions of the contract will continue unchanged. Notice of any future changes in rates, terms, and conditions of SECTV's business service will be provided to you as required by law or by your contract

You always have the right to select another provider for your voice service, but we believe you will be completely satisfied with SECTV. You will not be charged any fees for the transfer to SECTV, and SECTV will be responsible for any carrier change fees that might apply as a result of such transfer. Please be aware once your account becomes an SECTV account, if you choose to select a new provider before your contract has expired, you may be subject to early termination fees through SECTV.

If you have placed a preferred carrier "freeze" on your telephone services to prevent their unauthorized transfer to another service provider, FCC rules require that the freeze be lifted at the time of the transfer to SECTV. At your request, SECTV can reestablish preferred carrier "freeze" protection for your account after the transfer; just give us a call at 610 865-9100. If you do not have a "freeze" on your account, no action is required. SECTV will gladly respond to any questions you may have about its service either prior to or during the transfer.

Until the transfer date, SET will continue to be responsible for your Telephone service. You should contact SET at 610-841-4100 with any questions, complaints, or other customer service inquiries you may have prior to the transfer. After the transfer date, you should contact SECTV at 610-865-9100 with any questions.

Thank you and we look forward to continuing to serve you following the transition.